

05-4-6-1

ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

JUL 26 1971

Honorable William D. Ruckelshaus
Administrator
Environmental Protection Agency
Washington, D. C. 20460

Dear Mr. Ruckelshaus:

Due to the environmental implications surrounding alternatives to 18 CFR 610 (discharge of oil regulations), the problem of oil pollution has been considered in detail at the quarterly national meeting of SCOPE.

It is apparent to us after studying and discussing this matter that any attempt to define harmful quantities of oil requires a consideration of many complex and interrelated technical and scientific factors. It is also apparent that the present knowledge about these factors and interrelationships is very limited. In view of the many unknowns involved, SCOPE favors a stringent course of action weighted heavily in favor of environmental protection. Environmental safety factors must be designed into our laws and regulations to compensate for our imperfect knowledge.

SCOPE's view is that the present regulation, 18 CFR 610, which defines a harmful discharge of oil in terms of a sheen, sludge, or emulsion, should not be weakened. Such an amendment might be interpreted as a dilution of the regulatory functions of EPA. We strongly favor preservation of the visible standard established by this regulation which lends itself to easy identification of violations by both the public and governmental agencies. In addition, we favor working toward a policy prohibiting all discharges of oil into the environment, because substantial amounts of oil can be released without causing a sheen. While we recognize the practical difficulties that the present regulation and the intended goal present to industry, we feel that industrial ingenuity and resourcefulness are sufficient to overcome these problems.

Hopefully, future research will provide more answers on this complex issue. Until the knowledge is more complete, however, we urge EPA to support strong measures capable of protecting our environment. The resulting challenge to industry is highly preferable to the irreparable environmental damage that could otherwise result.

On behalf of the National SCOPE Council,

Sincerely yours,

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John T. Shiner Lance M. King
Special Assistants, SCOPE